

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

PAUL WILLIAMS-ISRAEL, Individually and
on behalf of all others similarly situated,

Plaintiff,

v.

IRIS ENERGY LIMITED, DANIEL
ROBERTS, WILLIAM ROBERTS, and
BELINDA NUCIFORA,

Defendants.

Case No.: 1:24-cv-07046-PK

Hon. Peggy Kuo

**NOTICE OF MOTION OF DEAN GIBBONS FOR APPOINTMENT AS
LEAD PLAINTIFF AND APPROVAL OF SELECTION OF COUNSEL**

**TO THE CLERK OF THE COURT, ALL PARTIES AND THEIR RESPECTIVE
ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that Dean Gibbons (“Movant”) respectfully moves this Court for an order: (1) appointing Movant as Lead Plaintiff in the above-captioned action (the “Action”) pursuant to § 21D of the Securities Exchange Act of 1934 (“Exchange Act”), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”) and (2) approving Movant’s selection of Levi & Korsinsky, LLP as Lead Counsel for the Class.

Movant seeks appointment as lead plaintiff and approval of his choice of counsel pursuant to the Exchange Act, the Federal Rules of Civil Procedure, and the PSLRA. This motion is based on this notice, the attached Memorandum of Law, the Declaration of Adam M. Apton in support thereof, and the Court’s complete files and records in this action, as well as such further argument as the Court may allow at a hearing on this motion.

[Signature on following page.]

Dated: December 6, 2024

Respectfully Submitted,

LEVI & KORSINSKY, LLP

By: /s/ Adam M. Apton

Adam M. Apton

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*Lead Counsel for Dean Gibbons and
[Proposed] Lead Counsel for the Class*